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By ECF

September 14, 2020

The Honorable Cheryl L. Pollak
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Courtroom 13B – South
Brooklyn, NY 11201

Star Auto Sales of Bayside, Inc. et al. v.
Voynow, Bayard, Whyte and Company, LLP et al.,
U.S.D.C., E.D.N.Y. 18-cv-05775-ERK-CLP

Dear Judge Pollak,

This firm represents the Plaintiffs in the above-referenced matter.

Pursuant to Your Honor's Minute Entry Order dated June 17, 2020, Plaintiffs and Defendants jointly submit this status letter.

As discussed at our last conference, the parties continue to experience delays in connection with the collection and processing of documents due to the Covid-19 pandemic. Nevertheless, last week Plaintiffs made a production of over 8000 pages of documents and Defendants produced documents received pursuant to certain subpoenas served late last year. Most importantly, Defendants' effort to manage the bulk of documents continues, as they are still working with various vendors to collect and process boxes of hard copy documents stored in warehouses in New York and Pennsylvania. Plaintiffs' counsel has been informed that the vendors are experiencing work staffing shortages and restrictions on the number of employees permitted onsite. As a result, progress has been delayed. There is hope that the documents can be moved to Washington D.C. where we understand the vendor can process the project more quickly.

The parties will continue to work with their consultants and staff to safely collect and process additional documents. The parties expect that document discovery will continue to be hampered by the pandemic in the short term. However, we have seen more process in recent weeks.

Furthermore, we are pleased to report that Court intervention is not necessary at this time as counsel have been able to work well together thus far.

Accordingly, we respectfully request that the Court set a date in November for the submission of a joint status letter or a telephonic status conference.

Respectfully submitted,

/s/ Stephen Arena

Stephen Arena
For Plaintiffs

cc: Counsel of Record (via ECF)